American Bottom Conservancy

527 Washington Place, **East St. Louis**, **IL 62205 (618) 271-9605**, **Fax (618) 271-965**1

May 1, 2002

Mr. Tom Skinner, Regional Administrator U.S. EPA Region 5 77 W. Jackson Blvd. Chicago, IL 60604

Re: Sauget Area 1 Dead Creek TAG Application

Dear Mr. Skinner:

Attached please find our application for a Technical Assistance Grant for the Sauget Area 1 Dead Creek site. Thank you for your consideration of our application.

Sincerely,

Kathy Andria President

Attachment

Prescribed by OMB Circular A-102

5. APPLICANT INFORMATION Legal Name American Bottom Conservance Address (give city, county, state, and zip code) 527 Washington Pl. E. St. Louis', 14 62205 6. EMPLOYER IDENTIFICATION NUMBER (EIN) 8. TYPE OF APPLICATION: If Revision, enter appropriate letter(s) in box(es) A. increase Award D Decrease Ouration 10. CATALOG OF FEDERAL DOMESTIC ASSISTANCE NUMBER: THE Superfund Technical Assistance Grant 12. AREAS AFFECTED BY PROJECT (Cines. Counties, States, etc.):
Cahokia, Sauget, E. St. Louis, American Bottom, St. Clair County 13. PROPOSED PROJECT Start Date Enging Date 7-1-02 **B-3**0-05 15. ESTIMATED FUNDING a Federal a Applicant c. State d Locai e. Other Program Income g TOTAL 18. TO THE BEST OF MY KNOWLEDGE AND BELIEF, ALL DATA IN THIS APPLICATION/PREAPPLICATION ARE TRUE AND CORRECT, THE DOCUMENT HAS BEEN DULY AUTHORIZED BY THE GOVERNING BODY OF THE APPLICANT AND THE APPLICANT WILL COMPLY WITH THE ATTACHED ASSURANCES IF THE ASSISTANCE IS AWARDED. Type Name of Authorized Representative c. Telephone Number Kathy Andria Project Directo 618 871-9605 Date Signed 5-4-02 Previous of tion Usable Standard Form 424 (REV. 4-92)

Application

Construction

X Non-Construction

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BUDGET INFORMATION - Non-Construction Programs

		~~~~	ON A - BUDGET SUMMA	RY			
Grant Program Function	Catalog of Federal Domestic Assistance	Estimated Unobligated Funds			New or Revised Budget		
	Number	Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)	
Technical Assistance	66-806	\$	\$	\$	\$	\$	
Grant at: Sauget Site No	.1						
Totals See D	etailed Budge	In Project N	sad we s	tatement,	Section 2B	\$	
		SECTIO	N B - BUDGET CATEGO				
Object Class Categories		Technical	GRANT PROGRAM, F	GRANT PROGRAM, FUNCTION OR ACTIVITY			
a. Personnel	,	Assistance	\$	\$	(4) \$	\$ (5)	
b. Fringe Benefits			Sea Details Stateme	nt Section	Project Na	raline	
c. Travel							
d Equipment							
e. Supplies				,			
f. Contractual							
g. Construction							
h. Other							
i. Total Direct Char	ges (sum of 6a-6h)						
j Indirect Charges	· •						
k. TOTALS (sum o	l 6i and 6j)	\$	\$	\$	\$	\$	
						<u> </u>	

		: NON-FEDERAL RESOL			
(a) Grant Program	(b) Applicant	(c) State	(d) Other Sources	(e) TOTALS	
8 Technical Assistance at:	\$	\$	\$	\$	
9.		See detai	nt Section	2(B)	arrative
10.			·		
11.					
12 TOTAL (sum of lines 8 – 11)	\$	\$	\$	\$	
	SECTION	D - FORCASTED CASH N	EEDS		
	Total for 1st Year	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
13. Federal	\$ \$ 70 000	5 000	5 500	\$ == 5000	5000
14. NonFederal	3000	1000	1 000		1000
15. TOTAL (sum of lines 13 and 14)	\$ 23000	\$ 6000	6000	\$ 5000	\$ 600D
SECTIO	NE - BUDGET ESTIMATES OF F	EDERAL FUNDS NEEDED	***		
(a) Grant Program	(b) First	FUTURE FULDI	G PE MODO (Years) (d) Third	(e) Fourth	
6 Technical Assistance Gran	Snone	none	none	s none_	
5 Sauget Site No. 1					
18.					
19.					
70 TOTAL (sum of lines 16:19)	\$	\$	\$	\$	
	SECTION F	OTHER BUDGET INFORM	IATION		
Direct Charges:     NA	22. Indirect Charges: NA				
3. Remarks:					

#### ASSURANCES — NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET, SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program, If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant I certify that the applicant:

- Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
- Will give the awarding agency, the Comptroller General of United States, and if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
- Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
- Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
- Will comply with the Intergovernmental Personnel Act of 1970 (42 U. S. C. §4728-4763) relating to prescribed standards for merit systems for programs funded under one of the nineteen statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C. F. R. 900, Subpart F).
- 6. Will comply with all Federal statutes relating to nondiscrimination These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U. S. C. §1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation

- Act of 1973, as amended (29 U. S. C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U. S. C. §6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P. L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. 290 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records: (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (i) the requirements of any other nondiscrimination statute(s) which may apply to the application.
- 7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
- 8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

- Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a - 7), the Copeland Act (40 U.S.C. §§276c and 18 U.S.C. §§874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally assisted construction subagreements.
- 10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
- 11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990: (d) evaluation of flood hazards in floodplains in accordance with EO 11988: (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clear Air) Implementation Plans under Section 176(c) of the Clear Air Act of 1955, as amended (42 U.S.C. §§ 7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended, (P.L. 93-523); and (h) protection of endangered species under the Endangered Species Act of 1973, as amended, (P.L. 93-205).

- 12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
- 13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. 470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. 469a-1 et seq.).
- 14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
- 15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. 2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
- 16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§ 4801 et seq.) which prohibits the use of lead based paint in construction or rehabilitation of residence structures.
- 17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act of 1984 or OMB Circular No. A-133, Audits of Institutions of Higher Learning and other Non-profit Institutions.
- Will comply with all applicable requirements of all other Federal laws, executive orders, regulations and policies governing this program.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	President/ Project Director		
APPLICANT ORGANIZATION American Bottom Conservanc Dead Creek Task Force	DATE SUBMITTED  S-4-02		

## Project Narrative Statement Section 1 (Group Qualifications)

## A. Group Eligibility

- 1) No.
- 2) The Dead Creek Task Force of the American Bottom Conservancy was formed in March of 2002 in order to apply for a technical assistance grant for the Dead Creek Sauget Site No. 1. Its members are experienced community and/or environmental activists who have been tracking agency and PRP activity related to this site for several years. The Task Force consists of representatives from American Bottom Conservancy (ABC), East St. Louis Community Action Network (ESL CAN), Golden Garden, Inc. (GGI) of Centreville, Neighborhood Law Office in East St. Louis, and residents of Cahokia and surrounding communities. Both ABC and ESL CAN filed letters of intent with EPA and joined forces in order to apply for a TAG grant. They tried unsuccessfully to form a coalition with a third group, formed by the mayor of Cahokia, which also filed a letter of intent.

ABC is incorporated as a not-for-profit organization in the State of Illinois. Its mission is to protect, preserve, enhance, restore and promote the natural, cultural and historical resources of the American Bottom, the Mississippi River floodplain of southwestern Illinois, which includes East St. Louis, Cahokia and Sauget. ABC is a member of the Illinois Department of Natural Resources Ecosystem Partnership program. Kathy Andria, president of ABC, represents the organization on the Task Force and will serve as project director for the grant.

ESL CAN, incorporated as a not-for-profit organization in the State of Illinois, is an independent, nonpartisan, nondenominational city-wide coalition of independent community-based organizations and residents that seeks to empower citizens and improve the quality of life for East St. Louis residents and businesses. East St. Louis borders Sauget and is part of the Dead Creek site. James Jones, interim director, is ESL CAN's representative on the Task Force.

Golden Garden, Inc. is incorporated as a not-for-profit in the State of Illinois. Its mission is to combat community degradation and improve the quality of life for Centreville citizens through social, educational, economic and human resources. Centreville is located in the American Bottom and borders East St. Louis, Sauget and Cahokia. GGI President Roosevelt Fair-Kincaid represents the organization and several Centreville citizens who own property in Cahokia and fish near Dead Creek.

Task Force member Bill Schmidt lives in Cahokia at 104 Judith Lane, within a few yards of Dead Creek. Mr. Schmidt has a well in his yard and is concerned about groundwater contamination and contamination of the environment. He is also concerned about the impacts of contamination on the value of his property. Also on the Task Force are Jack Norman and Kathleen O'Keefe. Norman is an officer of ABC and of the local Kaskaskia Group of the Sierra Club, and an appointed member of both the Southwestern Illinois Groundwater Protection Committee and the Governor's Groundwater Advisory Council. Kathleen O'Keefe, also a member of ABC, represents the Neighborhood Law Office in East St. Louis. O'Keefe works

with citizens and not-for-profit organizations in the greater East St. Louis area on environmental issues.

All representatives on the Task Force have attended various meetings held by EPA and others over the last several years; several have participated on Monsanto/Solutia's Community Advisory Panel. All members of the Task Force either live or have family or friends in the vicinity of the site and are therefore affected by the contamination. In addition, the natural, cultural and historical resources ABC is pledged to protect have been affected.

The members of the Task Force are concerned about the impact of the contamination on their health and that of their families and on the environment—especially groundwater, creeks and fish and wildlife—and the economic impact on the value of their homes and property. ABC is also concerned about its plans for an Indian Heritage Trail, which would connect present-day Cahokia, Dupo, East St. Louis and other historical communities with the World Heritage Site of Cahokia Mounds along an historic trail originally used by the Mississippian Indians. The contamination could affect those plans.

And, because of the history of flooding in the American Bottom—the area was named a presidential disaster area for flooding in 1993, 1994, 1995 and 1996—members of the group are also concerned about the decision to leave the contaminants in the floodplain rather than removing them to a hazardous waste impoundment out of the floodplain.

#### Section 1,

#### **B.** Responsibility Requirements

- 1) Administrative & Management Capabilities: Policy decisions will be made by the Task Force. Kathy Andria of ABC will serve as the project director. The grant will be administered by the Neighborhood Technical Assistance Center (NTAC) in East St. Louis, which will provide the 20 per cent in-kind match for the grant. In its sixth year of providing technical assistance to not-for-profit organizations in the East St. Louis Enterprise communities, NTAC is part of the East St. Louis Action Research Project (ESLARP) of the University of Illinois at Urbana-Champaign. NTAC has provided assistance to more than 80 organizations and administered dozens of state and federal grants for itself and community not-for-profits. Paul Adams is the acting director of NTAC and will provide support and guidance during the course of the grant.
- 2) Resources for Project Completion: In addition to administering the grant, NTAC will provide meeting space, equipment, supplies and technical assistance. ESLARP board members will assistant in drafting the contract with the technical advisor(s). Members of UIUC faculty will also advise Task Force members on various scientific and technical matters. NTAC's computer technician will assist the group in establishing a web page to disseminate information to the community. ABC and ESL CAN will also provide in-kind contributions. In addition to matching funds, the Task Force may solicit funds and additional resources from other sources.

- 3) Performance Record: NTAC has administered dozens of grants for itself and its community partners. ESL CAN has satisfactorily completed both federal and foundation grants. ABC is in the process of administering a C2000 grant for \$238,000 from the Illinois DNR. Neighborhood Law Office has successfully completed grants from both federal and foundation sources.
- 4) Accounting and Auditing Procedures: the Task Force will hire an outside certified public accountant to maintain financial records and perform audits.
- 5) Incorporation: ABC, ESL CAN and GGI are already incorporated as not-for-profit organizations in the State of Illinois. If required to incorporate as a separate entity, the Task Force will do so.
- 6) Drug-Free Workplace Policy: Yes
- F. Group Issues and Objectives
  - 1) Health Considerations: We are in the process of determining which, if any, members have experienced health effects. Among members represented are those whose wells and yards have been contaminated and who have eaten fish caught from area waters near the site.
  - 2) Consolidation/Representation: See introductory paragraph.
  - 3) Tasks for Technical Advisors: Review record, including reports of analyses of individual well samples. Assess plans and risks to health from contamination. Assess removal and storage. Assist in preparing messages for dissemination to the community, reporting and explaining assessment results.
  - 4) Information Sharing: In order to disseminate information to the community, we plan to establish a website and to produce two newsletters each year during the three-year grant interpreting the findings of the technical advisor(s). The website will be periodically updated to reflect current information and advise citizens of upcoming meetings. The newsletters will be professionally written and produced and distributed to the media, to libraries in each of the affected communities, to city/village clerks, to school districts and churches, to member organizations and to citizens who ask to be on a mailing list.
- 5) Economic/Environmental Considerations: All. See introductory paragraph. Expected to be discovered are reductions in the range of appropriate uses of nearby residential and commercial properties and in their corresponding market values.

#### Section 2—Statement of Work for the Technical Advisor

A. Statement of Work: We tried to follow EPA's website TAG guidance for this section, but it appears that the process at the Dead Creek Sauget Site No. 1 has not followed the usual Superfund process. From what we have been able to understand, there has been removal before there was a Record of Decision. We would, therefore, ask he technical advisor to advise us on the process that has been followed for the site and the procedure for comment and input.

In our discussions among the Task Force members, we have determined that we would like to have a scientific/technical advisor to examine, assess and interpret the record and another to advise us on health risks pertaining to groundwater, sufficiency of cleanup and impoundment in the floodplain. We will be meeting in the near future with advisors from UIUC for suggested specifications to be used in an RFP. Should EPA decide to award the grant to the ABC Task Force, we will submit a revised detailed budget.

### B. Detailed Budget:

Technical/scientific Advisor-\$20,000 including mileage

Health Risk advisor-\$15,000 including mileage

Newsletter writer/editor/designer-\$12,000 (half of which will be in-kind)

2 newsletters per yr. 40 hrs each @\$50 hr. \$4,000 for each of 3 years

Newsletter supplies and postage-500 copies, 400 mailed, 100 distributed

4-page newsletter \$300 postage per yr, \$900

paper/supplies/distribution costs 1,500

Total newsletter\$14,400 In kind 6,000

EPA funding 8,400

Project Director 4 hrs/wk @35 hr, 50 wks/3 yrs 21,000 (half of which will be in-kind)

In kind \$10,500 EPA funding 10,500

Accountant/auditor \$ 1.500

Misc supplies/copying/web host 5,100

In kind-Legal advice re contracts (UIUC) \$ 500

Administration of Grant (NTAC) 5,000 ABC project director/writer 16,500

NTAC supplies, meeting space, technical

oversight, web design 10,000

Task Force members time/mileage 5,000

Total in-kind \$37,000